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VIA ECF

Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

MEMO ENDORSE

OK  
Colleen McMahon  
4/21/2021

Re: *United States v. James Johnson*, 20 CR 687 (CM)

Dear Judge McMahon:

With the consent of Pretrial Services, I write to seek a modification to the conditions of Mr. Johnson's release. Specifically, we ask that the condition requiring Mr. Johnson to comply with a curfew be terminated. Mr. Johnson is currently working two jobs and, on curfew, Pretrial Services is unable to approve all of the hours Mr. Johnson requires to be outside of his home in order to maintain his work schedule. Accordingly, with Pretrial Services' consent, we ask that Mr. Johnson no longer be subject to a curfew. The government defers to Pretrial Services' recommendation on this application.

Respectfully submitted,

/s/ JULIA GATTO  
Julia L. Gatto  
Assistant Federal Defender

cc: AUSA Matthew Shahabian (via email and ECF)  
NJ-USPO Hernandez (via email)  
NY-USPO Cosme (via email)